

Ronald L.M. Goldman, Esq. (State Bar No. 33422)
rgoldman@baumhedlundlaw.com
Matthew P. French, Esq. (State Bar No. 327814)
mfrench@baumhedlundlaw.com
BAUM HEDLUND ARISTEI & GOLDMAN, P.C.
10940 Wilshire Boulevard, Suite 1600
Los Angeles, California 90024
Telephone: (310) 207-3233
Facsimile: (310) 820-7444

*Attorneys for Creditors,
Majesti Mai Bagorio, et al.*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

–and –

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case, No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER BY BAUM HEDLUND
ARISTEI GOLDMAN CAMP FIRE
VICTIM CLIENTS IN MOTION OF
WILLIAM B. ABRAMS PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2004 FOR ENTRY OF AN
ORDER AUTHORIZING DISCOVERY
AND HEARINGS REGARDING THE
ACTS AND CONDUCT OF JAMS
NEUTRALS GIVEN NEW EVIDENCE
[Doc. No. 12766]**

Response Deadline: September 13, 2022

Hearing If Order Granted:
September 27, 2022 (Pacific Time) or as
determined by the Court

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND THEIR**
2 **ATTORNEYS OF RECORD, UNITED STATES TRUSTEE, AND OTHER INTERESTED**
3 **PARTIES:**

4 Claimants Majesti Mai Bagorio, et al. (collectively, “Baum Hedlund Aristei Goldman Camp Fire
5 Victim Clients”; listed fully in Appendix A), which include nearly 200 victims of the 2018 Camp Fire,
6 hereby join in Motion of William B. Abrams Pursuant to Federal Rule of Bankruptcy Procedure 2004 for
7 Entry of an Order Authorizing Discovery and Hearings Regarding the Acts and Conduct of JAMS Neutrals
8 Given New Evidence.

9 **SCOPE OF JOINDER**

10 The Baum Hedlund Aristei Goldman Camp Fire Victim Clients join all relief sought in the Abrams’
11 motion for entry of an order, pursuant to Bankruptcy Rule 2004:

12 1. Authorizing Abrams and other PG&E victims with claims to serve discovery in the form
13 attached to the Motion as Exhibit B on JAMS Inc. neutrals associated with this case (the “Requests”) and
14 ensure that responses are posted to the Fire Victim Trust portal for review by PG&E victims holding claims;

15 2. Authorizing JAMS neutrals or their designee(s) to respond to victim discovery requests
16 within ten (10) days of receipt of the Requests and, the JAMS neutrals shall be directed to either (i) produce,
17 on a rolling basis, all non-privileged documents and written responses to the Requests, or (ii) file all
18 objections and/or responses to the Request with this Court;

19 3. Authorizing Abrams and other PG&E victims with claims to hold a hearing on Tuesday,
20 September 27, 2022, via Zoom so that victims may ask questions and get answers from the Current Trustee,
21 Former Trustee and other JAMS neutrals regarding their selection/hiring process, contractual terms, and
22 associated financial incentives.

23 [Doc. No. 12766, pp. 16-17]

24 **APPLICABILITY OF MOTION TO JOINING PARTIES/CLAIMANTS**

25 The relief requested by the Abrams motion and the grounds supporting that relief apply to The Baum
26 Hedlund Aristei Goldman Camp Fire Victim Clients as they have the same standing as Abrams, and the
27 same factors affecting Abrams, affect their claims as well.

1 The Baum Hedlund Aristei Goldman Camp Fire Victim Clients join in the Abrams motion [Doc.
2 No. 12766], rather than separately filing their own motion, to minimize the burden on this Court, which
3 might be faced with separate motions from thousands of Claimants of the Fire Victim Trust.

4 **CONCLUSION**

5 For the foregoing reasons, the Baum Hedlund Aristei Goldman Camp Fire Victim Clients urge that
6 the Court order the relief requested, pursuant to Bankruptcy Rule 2004, and for such other and further relief
7 as may be just.

8
9 Dated: August 26, 2022

Respectfully submitted,

10 BAUM HEDLUND ARISTEI GOLDMAN

11
12 By: /s/ Matthew P. French
13 Ronald L.M. Goldman
14 Matthew P. French,

15 *Attorneys for Creditors,*
16 *Majesti Mai Bagorio, et al.*
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EXHIBIT A

Bainbridge , Robert (deceased)

Barker, Michelle

Barnard, Melissa; David Barnard, Tristan Barnard, Aiden Barnard, Hunter Barnard

Bates, Sarah

Bensel, Connie

Bird, Devon; A.E., a Minor

Bird, Douglas; Kathy Bird,

Boyd, Judith; Thomas & Judith Boyd Family Living Trust

Burton, Paul

Bustamante, Rudy; Diego Bustamante

Cameron, Denise

Chambers, Thomas

Christian, Kathy

Costa, Andrew; Shannon Costa, J.C., a Minor

Costa, Lynn

Culley, Denise; Emmett Culley

Darrin, Daniel

Dechter, Lorraine

Deen, Janet

Delaney, Colleen; John Struthers

Dobra, Susan; John Michael Sun

Ellis, David; Patricia Ellis

Ferreira Steve; Jill Ghirardelli

Flores, Lisa

Garcia, Jerry; Sharon Garcia

Gilbertson, Regan; Wayne Wise, C.W., a Minor

Gottowski, Gary; Rebecca Gottowski

1 Griffin, Suzanne
2 Gunn, Linda
3 Haber, Tom; Jeanne Haber
4 Hill, Mark; Nancy Hill
5 Ingoglia, Joseph; Arlene Ingoglia
6 Jolley, Joan; Jane Ann Balsiger
7 Jones, Norman
8 Joseph, Daniel
9 Kasza, Elizabeth
10 Kearley, Justine
11 Koenig, David
12 Kunst, John; Vicki Kunst
13 Lawhun, Jolene; Mateo Lawhun, A. L., a Minor
14 Lawhun, Nicole; Steven Lawhun, Monica Mae Baggorio, Majesti Mai Bagorio, Yhana Mia Quinones-
15 Gallegos, David Astrup, M.B, a Minor and M.B., a Minor
16 Lawhun, Lucille
17 Lazzarino, Mark; Stacy Lazzarino, T.L, I.L., J.L., Minors
18 Lemos, Dhara; Rahaysa Poe
19 Lewis Kelly; Michael Quigley
20 Alexis Liles
21 Luce, David
22 Luce, Edward; Jeri Ann Luce
23 Madruga, Maria; N.M. a Minor
24 Magalia Community Church
25 Matson, Kelly
26 McKinnon, Mark; Wendy McKinnon
27 Menezova, Maria; Elena Tonetti
28 Miller-George, Sandra; John Miller-George

1 Morch, Andreas; Joanne Morch
2 Moseley, Madison
3 Myers, Jean; James Myers
4 Paradise Community Guild
5 Parker, Rosalie; Paul Switzer
6 Petersen, Jennifer; David Pendergast, Michael Petersen, Logan Pendergast, Porter Petersen, Cheryl
7 Pendergast, Wilbert Pendergast, Jr.
8 Phelps-Zink, David; Lori-Phelps-Zink
9 Poe, William; Maria Moraes
10 Quattlander, Karen
11 Renn, Carole Louise
12 Rose, James
13 Schuttenberg, Mark; Tanya Schuttenberg
14 Sherman, Fay; Anne Sherman
15 Smelser, Matthew; Brandy Alexander
16 Sonntag, Walter; Diane Sonntag
17 Sprague-Haber, LLC
18 Sprague, Andy; Janelle Sprague, Serigne Saliou Birama Seyon Gueye
19 Stewart, Donald; Jessie Stewart, G.S., a Minor
20 Strange, Wendy
21 Swiger, Jennifer
22 Swiger, John
23 Thorn, Steven
24 Toci, William; Diana Toci
25 Turner, Meghan; Charles Turner, W.T., H.T, Minors
26 Varlinsky, Ray; Marianna Love
27 Vigo, Phillip; Karissa Vigo, A.V., D.B. Minors
28 Ward, Nicholas

Westrope, Anthony
Williams, Robert
Winterburn, Anthony; Alexandria Winterburn, A.W., a Minor
Wonacott, Victoria
Yang, Zongmei
Zink, Don

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**JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIM CLIENTS IN
MOTION OF WILLIAM B. ABRAMS PURSUANT TO FEDERAL RULE OF BANKRUPTCY
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HEARINGS REGARDING THE ACTS AND CONDUCT OF JAMS NEUTRALS GIVEN NEW
EVIDENCE [Doc. No. 12766]**

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

/s/ Matthew P. French
MATTHEW P. FRENCH